

DNC, and had “a very real interest in possible significant contributions in the future.”⁷⁶⁵ Collier stated in his memorandum that the Shakopee were “interested in raising one substantive issue with the Chairman: The Department of Interior’s possible reconsideration of the tribe’s adoption ordinance.” Collier proposed in his memo the specific means of achieving that goal: Fowler would inform Ickes of the tribe’s concern, and Ickes would then inform Deputy Secretary of the Interior John Garamendi. On the day of the meeting, Collier and the tribal representatives did in fact deliver to the DNC a \$20,000 check from the tribe and asked Fowler to contact Ickes about the pending matter at Interior. On June 19, 1996, Interior Solicitor John Leshy sent a letter to the attorney for the Shakopee dissidents stating that Interior would not undertake a review to reconsider approval of the adoption ordinance.

Although there is no evidence to prove that Fowler, the DNC or Ickes took any action regarding this matter after the June 4 meeting, a troubling pattern emerges from these facts which suggests that Fowler and Collier both understood from prior experience that campaign contributions could lead Fowler to intervene with Interior via the White House. The route that Collier took to convey his clients’ concerns about a specific administrative matter pending before Interior suggests that Fowler and Collier believed that an effective way to lobby Interior on a substantive matter concerning Indians was to link the matter to campaign contributions. Secretary Babbitt’s former chief of staff apparently perceived that an appropriate means of lobbying his former agency was to make a contribution to the DNC and seek its intervention with

⁷⁶⁵Memorandum from Thomas Collier to Gretchen Lerach, June 3, 1996. In fact, the Shakopee made three additional contributions to the DNC totaling \$75,000 over the subsequent four months. *See supra* at 340-46.